

**IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF PENNSYLVANIA**

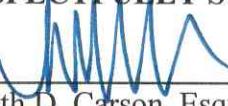
THE MIDDLE EAST FORUM : CIVIL ACTION
Plaintiff, : NO. 2:19-cv-05697-JS
v. :
LISA REYNOLDS-BARBOUNIS : MOTION FOR SANCTIONS
Defendant. :
:

**DEFENDANT'S MOTION TO VACATE ENTRY OF
DEFAULT UNDER FEDERAL RULE OF CIVIL PROCEDURE 55(c)**

Defendant, Lisa Barbounis through undersigned counsel hereby files this Motion to Vacate Entry of Default Judgement under Federal Rule of Civil Procedure 55(c). Rule 55(c) provides that relief from the entry of a default may be granted for "good cause shown." Fed. R. Civ. P. 55(c) ("For good cause shown the court may set aside an entry of default"). If the movant files its motion to vacate within one year of the entry of a default judgment, Rule 60(b)(1) permits the court to grant the motion if there had been "mistake, inadvertence, surprise, or excusable neglect" on the defendant's part. In this case, Counsel for Defendant mistakenly miscalculated the time for Defendant to file an Answer to Plaintiff's First Amended Complaint.

RESPECTFULLY SUBMITTED

By:


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